

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

TAMMY WALDEN THOMAS,

Defendant.

§  
§  
§  
§  
§  
§  
§  
§

NO. 3:21-CR-046-N

**MOTION FOR CONTINUANCE OF TRIAL**  
**AND PRETRIAL DEADLINES**

Defendant, **Tammy Walden Thomas**, by her counsel, Gabriela Vega, moves this Court for an order continuing the trial and related dates set and for a finding of excludable time under the Speedy Trial Act as found in Title 18, United States Code, §§ 3161, *et seq.* In support therefore, counsel states:

1. Trial is scheduled for July 19, 2021.
2. Counsel requires additional time to review the facts and law with Ms. Thomas so she can decide how she would like to proceed.
3. Ms. Thomas seeks a continuance of at least ninety days. This request is not made for delay, but so justice may be served.
4. The government opposes a 90-day continuance but does not oppose a 30-day continuance.

For the reasons stated above, Ms. Thomas requests that her trial be continued for a period of at least ninety (90) days, or as the Court might otherwise direct, and that the related pretrial deadlines in the Court's prior scheduling order be similarly continued.

Respectfully submitted,

s/ Gabriela Vega

Gabriela Vega  
Assistant Federal Public Defender  
Northern District of Texas  
Texas Bar # 24084014  
525 Griffin Street, Suite 629  
Dallas, Texas 75202  
Phone (214) 767-2746  
Fax (214) 767-2886  
gabriela\_vega@fd.org

**CERTIFICATE OF CONFERENCE**

I certify that I conferred with Assistant United States Attorney Fabio Leonardi, and confirmed that the government opposes the 90-day request but does not oppose a 30-day continuance. Counsel understands that AUSA Leonardi intends to file a statement further explaining his position.

s/ Gabriela Vega

Gabriela Vega